

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN

IN RE:

Saengla Salykhom

Robert Noy Salykhom

Debtor(s)

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CASE NO. 16-05463

HON. James W. Boyd

MOTION TO INCUR DEBT

NOW COME the Debtors, Saengla and Robert Salykhom, by their counsel, Mapes Law Offices, and in support of their Motion to Incur Debt, state as follows:

1. This Chapter 13 case was filed on 10/27/2016.
2. Confirmation of the Chapter 13 Plan is pending.
3. Prior to filing, the Debtors discovered that one of their vehicles was subject to recall in the wake of the Volkswagen emissions scandal. As a result, they have sold their vehicle back to Volkswagen, leaving them with only one vehicle for the household.
4. Because the Debtors both work, they are now in need of a second vehicle in order to accommodate their disparate work schedules.
5. The Debtors have spoken with several car dealerships and found that they are eligible to obtain financing to purchase a vehicle.
6. The Debtors request permission to obtain financing for up to \$17,054.15.
7. The Debtors have received offers of financing as follows:
 - a. For the purchase of a 2011 Audi Q5, the Debtors have been approved for financing of \$17,054.15 at 21.99% APR, with 72 monthly payments of \$428.42 each.
 - b. For the purchase of a 2011 Audi A4, the Debtors have been approved for financing of \$16,040.30 at 25% APR, with 60 monthly payments of \$476.84 each.
8. The Debtors have attempted to obtain more competitive financial terms but have been unable to do so. Debtors believe that this purchase is in their best interests.
9. The Debtors will be able to afford the purchase by reducing amounts spent on other necessary expenses. The changes to their budget will not reduce the base amount to unsecured creditors.
10. A vehicle is a reasonable expense and is necessary in order for the Debtors to complete this Chapter 13 Plan.

WHEREFORE, the Debtors respectfully request an Order approving their Motion to Incur Debt.

Dated: 1/17/2017

/s/George J. George

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